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                 IN THE UNITED STATES DISTRICT COURT
              FOR THE NORTHERN DISTRICT OF CALIFORNIA
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   UNITED FARM WORKERS, )
                                       Case No. C 07-03950 JF
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   AFL-CIO, et al.,
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                      Plaintiffs,
                                        STIPULATED MOTION
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                                        TO STAY DEADLINES
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                                        PENDING RESOLUTION OF
         v.
                                        PENDING MOTIONS
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   ADMINISTRATOR,
   UNITED STATES
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   ENVIRONMENTAL
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   PROTECTION AGENCY,
                      Defendant.
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         Pursuant to Local Rule 7-12, the parties stipulate to stay the deadlines for
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   submission of the administrative record and dispositive motions pending resolution of
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   Plaintifffs' pending Motion to Compel Filing of a Complete Administrative Record and
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   Intervenor's pending Motion to Dismiss. The parties further stipulate to submit to the
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   Court a revised schedule for submission of the administrative record and dispositive
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   STIPULATED MOTION TO STAY DEADLINES PENDING RESOLUTION OF PENDING MOTIONS
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motions within two weeks of the Court's decisions on the pending motions if the case is not dismissed.

The deadlines in this case were originally established in a Joint Case Management Statement that was filed on March on March 19, 2008, and approved by the Court at the case management conference held Friday, March 21, 2008. The deadlines were subsequently modified pursuant to a stipulation that was filed on May 15, 2008 and approved by the Court on May 16, 2008. Plaintiffs have filed a Motion Compel Filing of a Complete Administrative Record, which the Court took under submission after a hearing on February 1, 2008. Intervenors have moved to dismiss the case for lack of subject matter jurisdiction and the Court took the motion under submission after a hearing on May 9, 2008.

Under the current schedule, the administrative record is due to be produced on July 14, 2008. The parties agree that it is appropriate to stay that deadline and the subsequent deadlines for submission of dispositive motions until the Court rules on the pending motions and to submit a revised proposed schedule within two weeks of the Court's decisions if the case is not dismissed.

Respectfully submitted this 7th day of July, 2008.

RONALD J. TENPAS Assistant Attorney General

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28	NO. C-07-03950 JF STIPULATED MOTION TO STAY DEADLINES PENDING RESOLUTION OF PENDING MOTIONS
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2	PURSUANT TO STIPULATION, IT IS SO ORDERED
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6	Honorable Jeremy Fogel
7	United States District Judge
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28	NO. C-07-03950 JF stipulated motion to stay deadlines pending resolution of pending motions - 5 -
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